

1 RENE L. VALLADARES  
Federal Public Defender  
2 Nevada State Bar No. 11479  
CHRISTOPHER P. FREY  
3 Assistant Federal Public Defender  
Nevada State Bar No. 10589  
4 200 S. Virginia Street, Suite 340  
Reno, Nevada 89501  
5 (775) 321-8451/Tel.  
(702) 388-6261/Fax  
6 chris\_frey@fd.org

7 Attorney for BRANDON ERIC NAVARRETE

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BRANDON ERIC NAVARRETE,

15 Defendant.  
16

Case No. 3:20-cr-00023-MMD-CSD

**STIPULATION TO CONTINUE**  
**MOTION DEADLINES**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Rene L. Valladares,  
18 Federal Public Defender, and CHRISTOPHER P. FREY, Assistant Federal Public Defender,  
19 counsel for BRANDON ERIC NAVARRETE, Christopher Chiou, Acting United States  
20 Attorney, and RANDOLPH J. ST. CLAIR, Assistant United States Attorney, counsel for the  
21 United States of America, that the parties herein shall have to and including March 11, 2022,  
22 to file any and all pretrial motions and notices of defense.

23 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
24 shall have to and including March 25, 2022, to file any and all responsive pleadings.  
25  
26

1 IT IS FURTHER STIPULATED AND AGREED, by and between the parties, that they  
2 shall have to and including April 1, 2022, to file any and all replies to dispositive motions.

3 This is the first stipulation to continue the motions deadlines. Counsel is requesting  
4 additional time to file pretrial motions mindful of the current trial date of April 25, 2022 at  
5 9:00 AM, the exercise of due diligence, in the interests of justice, and not for any purpose of  
6 delay.

7 DATED this 8th day of March, 2022.

8  
9 RENE L. VALLADARES  
Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

10  
11 */s/ Christopher P. Frey*  
By: \_\_\_\_\_  
12 CHRISTOPHER P. FREY  
13 Assistant Federal Public Defender  
Counsel for Brandon Eric Navarrete

*/s/ Randolph J. St. Clair*  
By: \_\_\_\_\_  
RANDOLPH J. ST. CLAIR  
Assistant United States Attorney  
Counsel for United States

14  
15  
16 **IT IS SO ORDERED.**

17 **DATED** this 14th day of March, 2022.

18  
19 

20 MIRANDA M. DU  
21 CHIEF UNITED STATES DISTRICT JUDGE  
22  
23  
24  
25  
26